## Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In re:	)	
Transaction Network Services, Inc., TSYS Acquiring Solutions, LLC and Electronic	) CC Docket No. 95-15	5
Payment Systems, LLC		
Regarding FCC Jurisdiction and RespOrg		
Responsibilities to Comply with Part 52 of	)	
the FCC's Rules and the MS/800 Tariff	)	
Requirements	)	

To: Office of the Secretary

Attn: Chief, Wireline Competition Bureau

## ELECTRONIC PAYMENT SYSTEMS, LLC'S MOTION FOR LEAVE TO EXCEED PAGE LIMITS

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April 25, 2011

# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

In re:	)	
Transaction Network Services, Inc., TSYS Acquiring Solutions, LLC and Electronic	) CC Docket No. 95-1:	55
Payment Systems, LLC	)	
Regarding FCC Jurisdiction and RespOrg	)	
Responsibilities to Comply with Part 52 of	)	
the FCC's Rules and the MS/800 Tariff	)	
Requirements	)	

To: Office of the Secretary

Attn: Chief, Wireline Competition Bureau

## ELECTRONIC PAYMENT SYSTEMS, LLC'S MOTION FOR LEAVE TO EXCEED PAGE LIMITS

Electronic Payment Systems, LLC ("EPS"), through its counsel, hereby submits this Motion for Leave to Exceed Page Limits set forth in Section 1.115(f) of the Commission's rules. In support of its motion, EPS submits the following:

On March 24, 2011, EPS submitted an Application for Review of Decision of the Wireline Competition Bureau to the Federal Communications Commission ("the Commission"). Subsequently TSYS Acquiring Solutions, LLC ("TSYS") and Transaction Network Services, Inc. submitted their Oppositions to EPS' Application for Review. The two (2) responses in opposition total over 30 pages.

Section 1.115(f) of the Commission's Rules, Application for Review proceedings, limits reply pleadings to 5 double-spaced typewritten pages. Given the length of the responses filed against

EPS' application and the variety of issues raised, EPS respectfully requests an extension for its reply, or in the alternative, that its reply be treated as a consolidated reply to the oppositions filed by TSYS and TNS.

There is some overlap in the issues raised by TSYS' and TNS' responses. Separate EPS' replies would be burdensome on the Commission's staff for review and unnecessarily repetitive. However, the five page limit for EPS' consolidated reply is simply not sufficient to address the issues raised in the over 30 pages of TSYS and TNS responses. A minimal increase would ensure EPS has a fair opportunity to respond to the numerous contentions. EPS values the Commission's limited time and resources, and respectfully requests it be allowed to consolidate two replies into a single reply, not to exceed 12 type-written pages (10 pages of substantive text).

RESPECTFULLY SUBMITTED this 25th day of April, 2011.

Scotty P. Krob

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Attorney for Electronic Payment Systems, LLC

#### CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2011, I electronically transmitted the foregoing document to the Federal Communications Commission using the ECFS System for filing. A copy of the foregoing Application for Review to the following via first-class mail, postage prepaid:

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